

EXHIBIT C

From: [Christopher Geddis](#)
To: [Harkins, Steven M. \(Assoc-ATL-LT\)](#); valpec@kirtlandpackard.com
Cc: DECValsartan@btlaw.com; [Lockard, Victoria D. \(Shld-ATL-LT\)](#); [Miller, Jessica D \(Skadden, Arps, Slate, Meagher & Flom LLP - Washington DC\)](#)
Subject: RE: [Ext] RE: Valsartan MDL - Agenda Items for 3/29 Conference
Date: Thursday, April 28, 2022 2:44:03 PM
Attachments: [image001.png](#)

Yes, we'll consider the "end of briefing" for all class related briefs to be the filing of the last replies in support of the class *Daubert* motions.

From: harkinss@gtlaw.com <harkinss@gtlaw.com>
Sent: Thursday, April 28, 2022 2:41 PM
To: Christopher Geddis <CGeddis@mazieslater.com>; valpec@kirtlandpackard.com
Cc: DECValsartan@btlaw.com; lockardv@gtlaw.com; jessica.miller@skadden.com
Subject: RE: [Ext] RE: Valsartan MDL - Agenda Items for 3/29 Conference

Thanks Chris. Just to confirm, do Plaintiffs also agree with the proposal for modifying the motion to seal deadlines, subject to the Court's approval?

Steven M. Harkins
Associate

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From: Christopher Geddis <CGeddis@mazieslater.com>
Sent: Thursday, April 28, 2022 1:30 PM
To: Harkins, Steven M. (Assoc-ATL-LT) <harkinss@gtlaw.com>; valpec@kirtlandpackard.com
Cc: DECValsartan@btlaw.com; Lockard, Victoria D. (Shld-ATL-LT) <lockardv@gtlaw.com>; Miller, Jessica D (Skadden, Arps, Slate, Meagher & Flom LLP - Washington DC) <jessica.miller@skadden.com>
Subject: [EXTERNAL]RE: [Ext] RE: Valsartan MDL - Agenda Items for 3/29 Conference

These deadlines all work for Plaintiffs. We'll include them in our letter, which we can file at 5 ET.

From: harkinss@gtlaw.com <harkinss@gtlaw.com>
Sent: Thursday, April 28, 2022 1:04 PM
To: Christopher Geddis <CGeddis@mazieslater.com>; valpec@kirtlandpackard.com
Cc: DECValsartan@btlaw.com; lockardv@gtlaw.com; jessica.miller@skadden.com
Subject: RE: [Ext] RE: Valsartan MDL - Agenda Items for 3/29 Conference

Chris,

Based on the extension entered by the Court and the commitment to provide responses to the Kaplan brief along the original timeline, Defendants propose the below schedule. This maintains the prior spacing between briefs but we have added one additional day to the general response deadline and corresponding reply deadline to account for the Memorial Day holiday the Monday before response briefs are due.

- Tuesday, May 3, 2022 - Deadline to file Daubert motions regarding class certification experts
- Wednesday, May 25, 2022 - Deadline for Plaintiffs to file response to Daubert motion regarding class certification expert Edward Kaplan, M.D.
- Thursday, June 2, 2022 - Deadline to file responses to Daubert motions regarding class certification experts
- Wednesday, June 8, 2022 - Deadline for Defendants to file replies to responses to Defendants' Daubert motion regarding class certification expert Edward Kaplan, M.D.
- Thursday, June 16, 2022 - Deadline to file replies to responses to Daubert motions regarding class certification experts

Please let us know if this proposed schedule is acceptable to Plaintiffs, and if so we will include it in our position statement to the Court.

One related issue we wanted to raise – the current deadlines for filing the motion to seal pursuant to local rules for the class certification briefing will begin to run as of the reply brief deadline on May 10th. Given the overlap between the class certification and class expert Daubert briefing exhibits, we thought it made sense to propose that the deadlines for meeting and conferring and filing the motion to seal could run from conclusion of the class expert Daubert briefing, such that the parties could address all of the documents at once. If Plaintiffs agree we can include in our position statement this afternoon as well.

Best,

Steven M. Harkins
Associate

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From: Christopher Geddis <CGeddis@mazieslater.com>

Sent: Wednesday, April 27, 2022 5:56 PM

To: Miller, Jessica D (Skadden, Arps, Slate, Meagher & Flom LLP - Washington DC)
<jessica.miller@skadden.com>; valpec@kirtlandpackard.com

Cc: DECValsartan@btlaw.com; Harkins, Steven M. (Assoc-ATL-LT) <harkinss@gtlaw.com>

Subject: RE: [Ext] RE: Valsartan MDL - Agenda Items for 3/29 Conference

EXTERNAL TO GT

Hi Jessica,

Defendants previously added the deadlines for our replies in support of *Daubert* motions for class experts to the agenda. Plaintiffs would like to confirm all deadlines for those motions in our letters. Please confirm that's acceptable.

Thanks,
Chris

-----Original Message-----

From: Miller, Jessica D <Jessica.Miller@skadden.com>
Sent: Tuesday, April 26, 2022 11:17 AM
To: Christopher Geddis <CGeddis@mazieslater.com>; valpec@kirtlandpackard.com
Cc: DECValsartan@btlaw.com; harkinss@gtlaw.com
Subject: RE: [Ext] RE: Valsartan MDL - Agenda Items for 3/29 Conference

Below is the final agenda. Please let me know if I am missing anything. When would you like to exchange inserts? Someone tell me if I am doing anything of this wrong since it's my first time :)

Agenda for CMC on Friday, April 29

1. Status of Defendants Motion to Compel Testing Documents from Ron Najafi
2. Status Update on the Meet and Confers Regarding Defendants' Indemnification and Defense Agreements
3. Holding the Clarification Motions Regarding General Causation in Abeyance
4. PFS Deficiency Issues

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Skadden

From: Christopher Geddis [CGeddis@mazieslater.com]
Sent: Tuesday, April 26, 2022 10:03 AM
To: Miller, Jessica D (WAS); valpec@kirtlandpackard.com
Cc: DECValsartan@btlaw.com; harkinss@gtlaw.com
Subject: [Ext] RE: Valsartan MDL - Agenda Items for 3/29 Conference

Hi Jessica,

Plaintiffs have two additional topics for the CMC:

- * Status Update on the Meet and Confers Regarding Defendants' Indemnification and Defense Agreements, and
- * Holding the Clarification Motions Regarding General Causation in Abeyance.

Best,
Chris

-----Original Message-----

From: Miller, Jessica D <Jessica.Miller@skadden.com>
Sent: Saturday, April 23, 2022 5:11 PM
To: valpec@kirtlandpackard.com
Cc: DECValsartan@btlaw.com; harkinss@gtlaw.com
Subject: Valsartan MDL - Agenda Items for 3/29 Conference

Hi,
I wanted to check if you have any agenda items for the Special Master conference next Friday.
All we have are PFS deficiency issues.
Thanks!
Jessica

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Further information about the firm, a list of the Partners and their professional qualifications will be provided upon request.

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Further information about the firm, a list of the Partners and their professional

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